

Site Address: Beachlands, 5 Sea Front, Hayling Island

Proposed Development: Full planning application for the development of 4No commercial units (E Use) and 32No residential units (C3 Use) over 4 floors with associated open space, public realm enhancements, demolition of the existing Beachlands Amusement Arcade Buildings and dwelling and associated works.

Reference: APP/24/00968

Response:

Thank you for re-consulting Coastal Partners on the above application, following submission of the revised Flood Risk Assessment Addendum. We wish to **maintain our objection**, on the grounds that our previous concerns relating to coastal flood and erosion risk, raised in our previous consultation responses from May 2025 and February 2025, still have not been adequately addressed.

The revised Flood Risk Assessment Addendum, dated June 2025, does address some of our previous comments raised in our May 2025 response, including confirmation of which flood resilience measures would be incorporated into the development and the uplifting of design flood levels and finished floor levels, using the UKCIP18 Upper End climate change scenario - please note, we defer to the Environment Agency for confirmation that these levels have been calculated correctly.

However, as previously raised in our May and February 2025 responses, the issues of coastal erosion, risk of wave overtopping, breach of defences or a change in management policy still have not been adequately assessed.

The revised FRA Addendum still places reliance upon the recommended management policies set out within the North Solent Shoreline Management Plan and Hayling Island Coastal Management Strategy for the protection of the site from coastal erosion over the development's lifetime. As we have previously raised, a recommended policy of 'Hold the Line' does not guarantee the continued availability of funding required for its implementation. Furthermore, it is the responsibility of the developer to ensure residents are protected from coastal flood and erosion risk for the duration of the development's lifetime, not that of Havant Borough Council.

The potential for wave overtopping or breach of defences has still not been assessed in the revised Flood Risk Assessment Addendum.

In addition, the Havant Borough Council Draft 'Building a Better Future' Local Plan 2025, currently out for public consultation, proposes a Primary Coastal Change Management Area (CCMA) along this frontage, based on the extent of indicative erosion zones modelled from the Hayling Island Coastal Management Strategy. Whilst we understand that this iteration of the Local Plan is not yet approved

and adopted and therefore does not currently bear any weight, it does raise questions over the appropriateness of this development in this location.

Kind regards,

Amy



**Coastal
Partners** Amy Adams AMIEnvSc BSc(Hons)